

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

: DATE FILED: _____

v.

: CRIMINAL NO. _____

BOUABID NADIR

: VIOLATION:

18 U.S.C. § 1001(a)(2)

: (false statement - 1 count)

18 U.S.C. § 911

: (false claim of U.S. citizenship - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 23, 2004, in the Eastern District of Pennsylvania,
defendant

BOUABID NADIR,

in a matter within the jurisdiction of Immigration and Customs Enforcement, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant NADIR stated, to an agent of Immigration and Customs Enforcement, that he is a United States citizen who was born in Brooklyn, New York, when as the defendant knew, he is a Moroccan citizen who was born in Morocco.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2004, in the Eastern District of Pennsylvania,
defendant

BOUABID NADIR

falsely and willfully represented himself to be a citizen of the United States to an agent of the
Bureau of Immigration and Customs Enforcement, when as the defendant knew, he is a
Moroccan citizen.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY